CERTIFIED MAIL RETURN RECEIPT REQUESTED

December 11, 1990

5HS-11

Peter Vagt Warzyn Engineering Inc. 435 Devon Park Drive Suite 702 Wayne, PA 19087

Re: Proposed Phase III Monitoring Well Locations - ACS NPL Site -

Griffith, Indiana

Dear Dr. Vagt:

I reviewed your December 7, 1990 Phase III Scope of Work letter proposing the installation of four new Phase III lower aquifer wells, two new Phase III upper aquifer wells, residential well sampling, landfill leachate sampling, sampling of the Phase III wells, and sampling of a limited number of Phase II upper aquifer wells on the edges of the contaminant plume.

Generally, I agree with your proposals and I am confirming my approval with this letter. However, I would like to outline my understanding of the purpose of the Phase III wells, the justification for their locations, and the purposes of select sampling strategies.

LOWER AQUIFER MONITORING WELL LOCATIONS

In reference to the installation of lower aquifer wells; the objective is not to completely delineate a source area, nor determine the exact dimension of the plume. Rather, the objective is to certify that the extent of the lower aquifer chloroethane and 2-butanone contamination has not exceeded the current site boundaries and to ensure that off-site wells are not currently in danger of contamination. The placement of the new lower aquifer wells assumes a northerly trending gradient with three of the new wells downgradient of a known contaminated well (MW-9) and one new well upgradient of MW-9. It is recognized that further investigation of the lower aquifer will be warranted during the actual remediation of the site, if not earlier.

UPPER AQUIFER MONITORING WELL LOCATIONS

The objective of upper aquifer well installation and associated sampling activities, is to further delineate groundwater contamination in the shallow aquifer in areas southeast of the site, and to ensure that residential wells are not currently in danger of contamination. Included in the sampling activities will

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be sampling of select Phase II upper aguifer wells MW-11 through Included in the October 5, 1990 letter from myself and Steve Siegel to you and Andrew Perellis, is outlined a sampling strategy for the upper aquifer wells (see page three of that letter and a copy of the signed agreement between the Steering Committee and USEPA, enclosed). This sampling strategy was designed to provide data during the next several months to demonstrate the rate of movement of the upper aquifer plume, and justify any action or inaction with regard to interim measures required to arrest further plume migration. The date for Phase III-Round 1 sampling, scheduled for November 1990 has already passed and it is anticipated that the actual date for Phase III-Round 1 sampling will occur in January 1991. It is anticipated then, that Phase III- Round 2 sampling (anticipated for February 1991) will occur sometime in April 1991.

RECOMMENDATIONS

After review of portions of the current RI Report and being provided the opportunity of a third phase of well installation and sampling, I have the following two suggestions for you to consider.

During the installation of the wells, it is recommended that additional upper and lower aquifer samples be taken and analyzed for total organic carbon (TOC) content. This is recommended due to the limited amount of data which was collected during Phase II of the RI. Additional samples will provide a better representation of an average value for TOC in site soils, thus improving the prediction capabilities of the risk assessment, the chances of success for the initial design of any groundwater recovery system, and to support or possibly modify the conclusions reached in Chapter 6 of the RI report.

During the groundwater sampling exercises, it is recommended that the field parameters measured during Phase II, i.e., Redox, Dissolved Oxygen, pH, specific conductance and temperature be completed for at least the first round of sampling of Phase III. This is to confirm the conclusions reached in the RI Report and to aid in the selection of alternatives during the FS (e.g., the implementability of in-situ methods).

As mentioned in the opening paragraphs, I agree with your proposals for the Phase III Scope of Work, with my understanding of the proposals, as outlined above.

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If you have any questions or concerns, please do not hesitate to call me at (312) 886-5116.

Sincerely,

Robert E. Swale Remedial Project Manager

cc: Reginald Baker, IDEM

bcc: Steve Siegel, ORC